

COMMENT SET 11

March 15, 2004

Eric Gillies
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



5948 Warner Avenue
Huntington Beach, CA
92649

Re: January 2004 Draft Environmental Impact Report for the Revised PRC-421 Pier Removal Project

Dear Mr. Gillies,

Thank you for the opportunity to comment on the State Lands Commission's Draft Environmental Impact Report (EIR) for the Revised PRC-421 Pier Removal Project. United Anglers strongly supports this project. Construction of the bird platforms will provide critical roosting and nesting habitat for endangered and threatened species. In addition, the construction of an artificial reef by toppling the concrete caissons and enhancing them with quarry rock will provide valuable habitat for fish and other marine life. We endorse State Lands' approach of making use of the existing structures to enhance the existing environment and provide important ecological benefits.

In fact, we believe that the value of increasing hard-bottom substrate in this location is greater than the Draft EIR suggests. According to the Draft EIR, only "minor benefits" are expected from creating an artificial reef improved recreational and commercial fishing, compared to removing the caissons (pp. 1-16 and 6-4). Elsewhere the document suggests that impacts on recreational fishing and diving "could be beneficial" but this is not certain (p. 4.9-9). In United Anglers' view, this understates the case for the artificial reef in an area where natural hard-bottom substrate is so limited. It is clear that fish, including overfished species such as rockfish, congregate and shelter at such structures. It is because we believe that enhancing hard bottom habitat in this area has considerable value that United Anglers is considering the use of hard-bottom mitigation funds to support this project. In addition to placing quarry rock, the artificial reef could be further enhanced with reef balls to increase the value to the fish. The State Lands Commission should recognize this important benefit as it considers a final decision on this project.

Thank you for your consideration of these comments.

Sincerely yours,

Tom Raftican
President, United Anglers

11-1

Commenting Party: United Anglers, Tom Raftican, President

Date of Comment(s): March 15, 2004

Responses to Comment(s):

- 11-1. Comment acknowledged. Please also refer to Comment 5-2 from the California Department of Fish and Game.